Case 3:02-cr-05719-RBL Document 1 Filed 08/08/02 Page 1 of 3

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AUG 08 2002

CR 02-5719 #1

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

NO.CRO2-5719 RJR INFORMATION

V.

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ROBERT R. KEPPEL, d/b/a www.cheet-sheets.com, d/b/a KEEN INTERACTIVE,

Defendant.

THE UNITED STATES ATTORNEY CHARGES THAT:

From in or about January 2001, until on or about October 17, 2001, in the Western District of Washington and elsewhere, the defendant, ROBERT R. KEPPEL, d/b/a www.cheet-sheets.com, d/b/a KEEN INTERACTIVE, aided and abetted by another person whose identity is partially known to the United States Attorney, did, without the authorization of Microsoft Corporation, the owner thereof, knowingly copy, duplicate, download, send, and convey, trade secrets, that is: Microsoft Certified Systems Engineer (MCSE) and Microsoft Certified Solution Developer (MCSD) exams and answers; which products were produced for and placed in interstate and foreign commerce, with intent to convert said trade secrets to the economic benefit of himself and others, and knowing that the offense would injure Microsoft Corporation, the owner of the trade secrets.

All in violation of Title 18, United States Code, Section 1832(a)(2) and Section 2.

CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 1834(a), as a result of the offense alleged above, ROBERT R. KEPPEL, d/b/a www.cheetsheets.com, d/b/a KEEN INTERACTIVE, shall forfeit to the United States of America any and all interest in property constituting, or derived from, any proceeds obtained, directly or indirectly as the result of said criminal offense, and any and all property used, or intended to be used, in any manner or part to commit, and to facilitate the commission of such offense, including but not limited to the following:

- 1. \$12,552.77 seized from Keen Interactive Business Account Number 153607353031 at US Bank;
- 2. \$1,062.12 seized from Personal Money Market Account Number 153591054652 in the name of Robert Keppel at US Bank;
- 3. \$1,570.16 seized from personal checking Account Number 153604461670 in the name of Robert Keppel at US Bank;
- 4. \$41,785.93 seized from Cheat Sheets Business Account Number 153691259540 at US Bank;
 - 5. A 2001 Lexus RX300 automobile, bearing VIN # JTJHF10U910197713; and
- 6. A 1997 Ferrari 355 Spider convertible automobile, bearing VIN # ZFFXR48A0V0107499.

If any forfeitable property, as a result of any act or omission of ROBERT R. KEPPEL, d/b/a www.cheetsheets.com, d/b/a KEEN INTERACTIVE, cannot be located upon the exercise of due diligence, has been transferred or sold to or deposited with a third person, has been placed beyond the jurisdiction of the Court, has been substantially diminished in value, or has been commingle with other property which cannot be subdivided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek the forfeiture of any other property of ROBERT R. KEPPEL,

1	d/b/a www.cheetshee	s.com, d/b/a KEEN INTERACTIVE, up to the value of the forfeitable
2	property.	
3	DATED this	gth day of August, 2002.
4		day of August, 2002.
5		MIBITO
7		JOHN McKAY United States Attorney
8		2100
9		bled & St
10		FLOYD G. SHORT Assistant United States Attorney
11		Assistant Officer States Attorney
12		Marath Muse
13		ANNUME L. HAVES
14		Assistant United States Attorney
15		Riallo
16		RICHARD COHEN
17		Assistant United States Attorney
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